

REMARKS

Applicants have carefully studied the outstanding Office Action. The present amendment is intended to place the application in condition for allowance and is believed to overcome all of the objections and rejections made by the Examiner. Favorable reconsideration and allowance of the application are respectfully requested.

Applicants have canceled claims 4, 5, 8, 12, 13, 16, 26, 27 and 37, and amended claims 1-3, 6, 7, 9, 15, 17-25, 28-29, 38, and 40-45 to more properly claim the present invention. No new matter has been added. Claims 1-3, 6, 7, 9-11, 14, 15, 17-25, 28-36 and 38-51 are presented for examination.

In Paragraph 1 of the Office Action the Examiner has objected to claim 42 because of an informality. Applicant has amended claim 42 accordingly.

In Paragraph 2 of the Office Action, the Examiner has rejected claims 1-8, 18-29 and 41-45 under 35 U.S.C. §101 as being directed to non-statutory subject matter. Applicant believes that the Examiner did not intent to reject claim 29 under section 101. Claims 1-3, 6, 7, 18-25, 28 and 41-45 have been amended to address the examiner's rejection under section 101. These claims are now directed to a computer readable medium which includes computer program instructions.

In Paragraphs 3 and 4 of the Office Action, the Examiner has rejected claims 1-7, 9-15, 17-19, 23-27, 29, 30, 34-38 and 40 under 35 U.S.C. §102(e) as being anticipated by Moore et al., US Pub. No. 2004/0189707 A1 ("Moore"). Applicants have canceled claims 4, 5, 12, 13, 26, 27 and 37 without acquiescence to the Examiner's reasons for rejection, and respectfully submit that rejection of these claims is thus rendered moot. Therefore only claims 1-3, 6, 7, 9-11, 14, 15, 17-19, 23-25, 29, 30, 34-36, 38 and 40 remain rejected in these Paragraphs under 35 U.S.C. §102(e).

In Paragraphs 5 and 6 of the Office Action, the Examiner has rejected claims 8 and 16 under 35 U.S.C. §103(a) as being unpatentable over Moore in view of

<http://Fototime.com/ftweb/fahelp/> published web pages 212.htm, 138.htm and 210.htm ("Fototime"). Applicant has canceled claims 8 and 16 without acquiescence to the Examiner's reasons for rejection, and respectfully submits that the rejection of these claims is thus rendered moot.

In Paragraph 7 of the Office Action, the Examiner has rejected claims 20-22, 28, 31-33 and 39 under 35 U.S.C. §103(a) as being unpatentable over Moore in view of Drucker, US Pub. No. 2006/0161867 A1 (Drucker").

In Paragraph 8 of the Office Action, the Examiner has rejected claims 41, 42, 44-47 and 49 - 51 under 35 U.S.C. §103(a) as being unpatentable over Drucker in view of Fototime.

In Paragraph 9 of the Office Action, the Examiner has rejected claims 43 and 48 under 35 U.S.C. §103(a) as being unpatentable over Drucker in view of Fototime and further in view of Graham et al., "Time as Essence for Photo Browsing through Personal Digital Libraries" ("Graham").

The rejections of claims 1-3, 6, 7, 9-11, 14, 15 and 17-51 in paragraphs 3-9 of the Office Action will now be dealt with specifically.

Moore describes filtering a file system to obtain views of files based on metadata properties, instead of conventional folder-based structures. Moore generates "virtual folders" that contain files with one or more common metadata properties, the files themselves being distributed over multiple and diverse physical storage devices (Moore/ pars. [0013], [0020], [0022] and [0064]). Filters described by Moore include date, author and category filters (Moore/ par. [0104]; FIG. 10). Moore also describes quick links, which are used to save filters (Moore/ pars. [0016] and [0017]; FIG. 30), and libraries which are used to group items with similar characteristics (Moore/ pars. [0018] and [0019]; FIG. 35).

Fototime describes a dialogue box for selecting from among a plurality of folders, including a picture date filter, a text filter, and other filters.

Drucker describes a system and method for generating and cataloging metadata for digital assets, by grouping and annotating the assets (Drucker/ pars. [0006] – [0008] and [0063] – [0065]).

As to amended independent system claim 1, applicants respectfully submit that the limitations in claim 1 of

"a plurality of interfaces for content filters that filter a catalog of assets, each interface including at least one control for setting at least one content filter parameter, the content filters including a category based filter and a file folder based filter", and

"a filter activation interface for displaying the content filter parameter settings and for displaying corresponding checkboxes, each checkbox being used for activating or de-activating its corresponding content filter"

are neither shown nor suggested in Moore, Fototime, Drucker or Graham.

In rejecting claim 8 in Paragraph 6 of the Office Action, the Examiner has cited Fototime as teaching a filter activation interface that includes a list of the plurality of content filters, with checkboxes for selectively activating each content filter.

The Examiner has further indicated that it would have been obvious to one of ordinary skill in the art at the time the invention was made to have used the filter activation feature using checkboxes menu as taught by Fototime to the system of filtering digital items as taught by Moore. Applicants respectfully submit that the architecture of Moore is not adaptable to the selective filter activation feature of Fototime. In fact, because of fundamental differences between the architecture of Moore and that of the present invention, the selective filter activation feature of Fototime works against the virtual folder paradigm of Moore. To appreciate this distinction, consider the following examples.

EXAMPLE I: Referring to FIGS. 6 - 9 of Moore and the corresponding discussion at pars. [0098]-[0101], once a filter has been set, Moore fails to teach how it can be de-activated without returning to a previous state. Once a user has selected a contract filter (element 520) followed by selection of a client filter (element 521), the user is unable to deactivate the contract filter, unless the user returns to the "All Items" view of FIG. 6, in which case the client filter setting is lost. Thus if the user has elected to filter according to "Client 1", the user can narrow the display based on "Contracts" or based on "Year", but the user cannot change the view to filter according to "Client 2" without first returning to the "My Documents" folder. This is because the virtual folder paradigm of Moore assumes that child filters are only applicable to their immediate parent filter; i.e., changing the parent filter invalidates the child filters.

In distinction, using the present invention, any filter can be de-activated by un-checking a checkbox, as shown in FIGS. 1A, 1B and 2 of the present specification. Using the present invention, the "Clients" filter can be changed without affecting the "Contracts" or the "Year" filter.

EXAMPLE II: Referring to FIGS. 26-29 of Moore and the corresponding discussion at pars. [0127]-[0130], once the user has selected a year for date filtering, the list of years 623 disappears, and the date filter cannot be de-activated unless the user returns to the original state illustrated in FIG. 26.

In distinction, using the present invention, the date filter can be de-activated by un-checking the checkbox shown in FIGS. 1A, 1B and 2 of the present specification.

The reason that the invention of Moore is unable to selectively de-activate filters using checkboxes is that the virtual folder paradigm of Moore necessarily uses a sequential hierarchical tree-traversal structure. As a result, when filters are nested in

Moore, the outer filters cannot be de-activated. This is apparent in FIG. 23, where *"items for which the selected properties do not match the filter term are removed from the collection on the display"* (Moore/ par. [0124]).

Moore emphasizes this point at par. [0064]: *"Virtual folders utilize the same or similar user interfaces that are currently used for file systems"*; and again at par. [0087]: *"Thus, the system is able to take a property that is stored in the database and represent it as a container that is like a folder. Since users are already familiar with working with folders, by presenting the virtual folders in a similar manner, users can adapt to the new system more quickly."* Thus the combination of Moore and Fototime is not feasible.

Another important distinction between Moore and the present invention is that Moore does not describe integration of a file folder based filter within Moore's virtual folder architecture. Instead, Moore uses a scope setting to define the physical file system locations that are included in the filter process (Moore/ par. [0093] and [0139] – [0141]; FIGS. 37 and 38). As such, the file based filtering of Moore cannot be selectively activated and de-activated through use of a checkbox. Although FIG. 18 of Moore illustrates physical file folders, the file folder representation is treated as an alternative to Moore's virtual file representation, and not as a filter for use with the virtual file representation (Moore/ par. [0117]). In distinction, the file folder based filter of the present invention is available for use in conjunction with the other filters, as illustrated in FIGS. 1A, 1B and 2 of the present specification.

Because claims 2, 3, 6 and 7 depend from claim 1 and include additional features, applicants respectfully submit that claims 2, 3, 6 and 7 are not anticipated or rendered obvious by Moore, Fototime, Drucker and Graham, taken alone or in combination.

In rejecting claim 7 in Paragraph 4 of the Office Action, the Examiner cited Moore as teaching a location based filter. The term "location" in Moore refers to a

location within a network of computers and their file systems. The term "location" in claim 7 refers to a geographical position, such as the place where a photograph was captured, as described in the original specification in par. [0035]. In order to clarify this distinction, applicants have accordingly amended the language of claim 7 from "location" to — geographical position --.

Accordingly claims 1-3, 6 and 7 are deemed to be allowable.

As to amended independent method claim 9 and amended claim 17 for a computer-readable storage medium, applicants respectfully submit that the limitations in claims 9 and 17 of

"providing a plurality of interfaces for content filters that filter a catalog of assets, each interface including at least one control for setting at least one content filter parameter, the content filters including a category based filter and a file folder based filter", and

"selectively activating or de-activating the content filters by checking or un-checking each of a plurality of checkboxes, the checkboxes corresponding to the content filters"

are neither shown nor suggested in Moore, Fototime, Drucker or Graham.

Applicants' arguments provided hereinabove for allowability of claim 1 apply here to claims 9 and 17.

Because claims 10, 11, 14 and 15 depend from claim 9 and include additional features, applicants respectfully submit that claims 10, 11, 14 and 15 are not anticipated or rendered obvious by Moore, Fototime, Drucker and Graham, taken alone or in combination.

Applicants' argument provided hereinabove for allowability of amended claim 7 applies here to amended claim 15.

Accordingly claims 9-11, 14, 15 and 17 are deemed to be allowable.

As to amended independent system claim 18, applicants respectfully submit that the limitation in claim 18 of

"an interface for generating a plurality of metadata constraints, wherein each constraint sets at least one value for a metadata property, for modifying values associated with the generated metadata constraints, and for selectively activating or deactivating the generated metadata constraints by respectively checking or un-checking checkboxes corresponding to the constraints"

is neither shown nor suggested in Moore, Fototime, Drucker or Graham.

Applicants' arguments provided hereinabove for allowability of claim 1 apply here to claim 18.

In rejecting claim 27 in Paragraph 4 of the Office Action, the Examiner has cited Moore as teaching modifying at least one generated metadata constraint. The term "modifying" as used by the Examiner refers to generating quick links, which are pre-defined links for generating views of files. The term "modifying" in claim 27 refers to changing parameter settings of a content filter; e.g., changing a date range in a date based filter, or changing a category criterion in a category based filter, as illustrated in elements 254 and 256 of FIG. 2 of the present specification, respectively. To clarify this distinction, applicants have amended claim 27 to include the limitation of constraints setting one or more values for a metadata property, and modifying values of generated metadata constraints.

Because claims 19-25 and 28 depend from claim 18 and include additional features, applicants respectfully submit that claims 19-25 and 28 are not anticipated or rendered obvious by Moore, Fototime, Drucker and Graham, taken alone or in combination.

In rejecting claim 28 in Paragraph 7 of the Office Action, the Examiner has indicated that it would have been obvious to one of ordinary skill in the art at the time the invention was made to have used the constraint lock processor as taught by

Drucker to the system of filtering digital images as taught by Moore. Applicants respectfully submit that the lock processor of Drucker is inappropriate for the system of Moore, inasmuch as the virtual folder paradigm of Moore assumes that an activated filter stays activated once another filter is selected. To appreciate this distinction, consider the following example.

EXAMPLE III: Referring again to FIGS. 6-9 of Moore, while browsing "Client 1" files, if the year 2002 is selected, then the resulting files displayed are "Client 1" AND "2002". Moore has no mechanism for unlocking the "Client 1" filter, unless the user returns to the "All Items" view of FIG. 6, in which case the year 2002 filter setting is lost.

The reason that the invention of Moore is unable to unlock filters is that the virtual folder paradigm necessarily uses a sequential hierarchical tree-traversal structure. As a result, when filters are nested in Moore, the outer filters cannot be unlocked. Thus the combination of Moore and Drucker is not feasible.

Accordingly claims 18-25 and 28 are deemed to be allowable.

As to amended independent method claim 29 and amended claim 40 for a computer-readable storage medium, applicants respectfully submit that the limitations in claims 29 and 40 of

"generating a plurality of metadata constraints, wherein each constraint sets one or more values for a metadata property", and

"selectively activating or de-activating the generated metadata constraints by respectively checking or un-checking checkboxes corresponding to the constraints" are neither shown nor suggested in Moore, Fototime, Drucker or Graham.

Applicants' arguments provided hereinabove for allowability of claim 1 apply here to claims 29 and 40.

Because claims 30-36, 38 and 39 depend from claim 29 and include additional features, applicants respectfully submit that claims 30-36, 38 and 39 are not anticipated or rendered obvious by Moore, Fototime, Drucker and Graham, taken alone or in combination.

Applicants' argument provided hereinabove for allowability of claim 28 applies here to claim 39.

Accordingly claims 29-36, and 38-40 are deemed to be allowable.

As to independent system claim 41, applicants respectfully submit that the limitation in claim 41 of

"wherein at least one such user interface display for a content filter is dependent upon the lock status of another content filter",

is neither shown nor suggested in Moore, Fototime, Drucker or Graham.

In rejecting claims 41, 44 and 45 in Paragraph 8 of the Office Action, the Examiner has cited Drucker as teaching that each content filter has a lock status, and teaching a lock processor for setting the lock status of at least one content filter. Specifically, the Examiner has cited video filter 1920 of FIG. 24 of Drucker as being rendered illuminated when activated. Applicants respectfully submit that, as described in pars. [0126] and [0128] of Drucker, video filter 1920 is merely an indicator, used for indicating that media objects 2420 include video. Video filter 1920 cannot be locked or unlocked at will. Applicants have carefully reviewed Drucker, and it appears to applicants that Drucker fails to teach a lock mechanism.

In rejecting claim 41 in Paragraph 8 of the Office Action, the Examiner has cited Fototime as teaching a user interface display for a content filter that is dependent upon the lock status of another content filter. Specifically, the Examiner has indicated that the items displayed in the group filter interface are dependent on what date range is selected from the date filter. Applicants respectfully submit that the items

displayed in the group filter interface are the same, regardless of the date range selected from the date filter. The group filter interface of Fototime always displays

- Vacations
 - Honeymoon
 - Trips to Europe
 - London Trip
 - Switzerland 1998
 - Cruises

regardless of the date range selected from the date filter. Of course, the date range selected from the date filter impacts the display of results that meet the combined filter criteria, but it does not impact the items displayed in the group filter interface alone. Whether the user selects a 1999 date range, or a 2000 date range, or another such date range, the items displayed in the group filter interface, as illustrated in Fototime, are always the same. The lock status of the date filter has no impact on the display of the group filter itself.

In distinction, as described in pars. [0040] – [0043] of the present specification, when using the present invention the content filter user interfaces themselves depend on the lock statuses of other content filters. Referring to FIG. 1A of the present specification, the statistics of 113 images captured in year 2002 and 118 images captured in year 2003, displayed in pane 150, change depending on whether the category filter set in pane 130 is locked or unlocked. Fototime fails to teach this limitation.

Similarly, regarding the Examiner's rejection of claim 42, the Examiner cites Fototime as teaching at least one user interface display containing at least one alphanumeric string dependent upon the lock status of another filter; specifically, the "Trips to Europe" alphanumeric string. Applicants respectfully submit that the "Trips to

Europe" alphanumeric string is always displayed in the group filter user interface of Fototime, regardless of the lock status of the date filter.

Because claims 42-45 depend from claim 41 and include additional features, applicants respectfully submit that claims 42-45 are not anticipated or rendered obvious by Moore, Fototime, Drucker and Graham, taken alone or in combination.

Accordingly claims 41-45 are deemed to be allowable.

As to independent method claim 46 and claim 51 for a computer-readable storage medium, applicants respectfully submit that the limitation in claims 46 and 51 of

"rendering a user interface display for a content filter, that is dependent upon the lock status of another content filter"

is neither shown nor suggested in Moore, Fototime, Drucker or Graham.

Applicants' arguments provided hereinabove for allowability of claim 41 apply here to claims 46 and 51.

Because claims 47-50 depend from claim 46 and include additional features, applicants respectfully submit that claims 47-50 are not anticipated or rendered obvious by Moore, Fototime, Drucker and Graham, taken alone or in combination.

Applicants' argument provided hereinabove for allowability of claim 42 applies here to claim 47.

Accordingly claims 46-51 are deemed to be allowable.

Support for Amended Claims in Original Specification

Independent claims 1, 9 and 17 have been amended to include the limitations of a category based filter and a file folder based filter. These filters are described in the original specification in pars. [0027]-[0029].

Independent claims 1, 9, 17, 18, 29 and 40 have been amended to include the limitation of checkboxes used to selectively activate or de-activate corresponding

content filters, or metadata constraints. This limitation is described in the original specification in pars. [0031]-[0033] and in original claims 8 and 16.

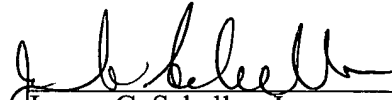
Claims 7 and 15 have been amended to include the limitation of a geographic position based filter. This limitation is described in the original specification in par. [0035].

Independent claim 18 has been amended to include the limitation of modifying generated metadata constraints. This limitation is described in the original specification at pars. [0028]-[0030] and [0037].

For the foregoing reasons, applicants respectfully submit that the applicable objections and rejections have been overcome and that the claims are in condition for allowance. Respectfully submitted,

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